

Message

From: BECKHAM, LISA [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=75A0012699094CF59508BB04E90B393C-LBECKHAM]
Sent: 4/10/2015 5:31:36 PM
To: Raju Bisht [rbisht@navajo-nsn.gov]
CC: Tennille B. Begay [tbbegay@navajo-nsn.gov]; Gutierrez, Roberto [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6cd6a5d6b7874fce8fc6476dc5ec000d-RGUTIERR]
Subject: RE: Re: NGS Addendum to Title V Renewal Application

I took a closer look. ☺ You are right, these are different. But, NGS needs to submit a Tribal Minor NSR application for this project.

It is not clear to me whether the application they already submitted to us is related to the PAC system. I'm inclined to think that they are (without information from NGS explaining why there are not.) I would prefer that they simply add this as an addendum to the existing application.

I don't see it being any trouble to get a tribal minor NSR permit revision for the PAC system before their October 1, 2015 deadline.

From: Raju Bisht [mailto:rbisht@navajo-nsn.gov]
Sent: Thursday, April 09, 2015 3:50 PM
To: BECKHAM, LISA
Cc: Tennille B. Begay
Subject: RE: Re: NGS Addendum to Title V Renewal Application

Lisa,

These are two different applications for different projects.

Thanks. Raju

From: BECKHAM, LISA [mailto:BECKHAM.LISA@EPA.GOV]
Sent: Thursday, April 9, 2015 4:36 PM
To: Raju Bisht
Cc: Tennille B. Begay
Subject: RE: Re: NGS Addendum to Title V Renewal Application

Hi Raju-

We received an application from NGS for a tribal minor NSR permit revision. As such, a PSD modification is not needed. Attached is a copy – I don't think they officially said it was a tribal minor NSR application, but that is how we are treating it.

Lisa Beckham
Environmental Engineer
Air Permits Office
EPA Region 9
(415) 972-3811

From: Raju Bisht [<mailto:rbisht@navajo-nsn.gov>]
Sent: Thursday, April 09, 2015 3:10 PM
To: BECKHAM, LISA
Cc: Tennille B. Begay
Subject: FW: Re: NGS Addendum to Title V Renewal Application

Hi Lisa,

Could you please take a quick look at the application, a copy of which was also sent to Region 9, and help us figure out if this would require a PSD or Minor NSR. If you look at the string of emails below, our contractor seems to think that it might trigger PSD since the baghouse is a control device. NGS is making an argument that the baghouses are an integral part of the silo and used for retention with no outlets and not control devices. If this indeed requires a construction permit, we would have to refer them to you and they are in a tight timeline to comply with MATS.

Thank you for your help. Raju

From: Heckel Kyle C [<mailto:Kyle.Heckel@srpnet.com>]
Sent: Tuesday, April 7, 2015 11:51 AM
To: Raju Bisht
Cc: Cenalmor Bruquetas Maria B (Barbara)
Subject: RE: Re: NGS Addendum to Title V Renewal Application

Hi Raju,

Thank you for your time on the call earlier this morning. I wanted to summarize what we had discussed regarding the potential emissions from the storage silo baghouses which are part of the Hg control strategy equipment included in the Title V renewal addendum application.

The proposed silos which will be storing powder activated carbon (PAC) are equipped with baghouses. While the baghouses do reduce the amount of emissions generated from the silos, their purpose is not as an emission control device. Having baghouses on storage silos is very conventional in the industry for purposes of preventing product from being lost during the unloading process. The baghouses are considered integral to the storage silo equipment as the silos would not be operated without them. As a result, uncontrolled potential to emit emissions should be based on grain loading rate of the baghouses, as was included in the Title V renewal addendum application submitted.

It should be noted that this approach is consistent with how other storage silos at NGS are handled. For example, the soda ash and lime handling operations at NGS include storage silos with baghouses equipped. The potential to emit calculations for the operations are based on emissions from the silos taking into account the control resulting from the baghouses. Further, there has been no need for operation and monitoring requirements to be included in the permit for these operations.

As a reminder, timing is becoming more critical. As part of the 1-year extension granted to NGS for complying with the Hg provisions of the MATS Rule, NGS must commence construction of the Hg control strategy by no later than October 1, 2015. Because commencing construction of the Hg control strategy equipment, including the PAC storage silos, is contingent on the issued Title V permit renewal, the Title V permit must be issued by October 1, 2015 for NGS to be able to comply with this deadline.

If you have any questions or need additional details, please let me know.

Thanks,

Kyle

Kyle Heckel
Salt River Project
Environmental Engineer
602-236-5493
Mail Station PAB352 - PO Box 52025 - Phoenix, AZ 85072

----- Original Message -----

Subject: Re: NGS Addendum to Title V Renewal Application

From: Yu-Lien Chu <Yu-Lien.Chu@erg.com>

Date: Apr 3, 2015, 12:20 PM

To: "Raju Bisht (rbisht@navajo-nsn.gov)" <rbisht@navajo-nsn.gov>

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Hi Tennille and Raju,

Have you discussed with EPA about the new Hg control system installation project (a calcium bromide application system and a PAC injection system) at NGS? I don't think we can incorporate this Hg control system to the Title V permit directly unless both NNEPA and EPA are certain that this project does not need a construction permit.

I think some sort of construction permit evaluation should be done before the project can be moved forward. The uncontrolled PM10 emissions from PAC injection system is 20 tons/yr [0.02 tons/yr / (1-99.9%) = 20 tons/yr] which is greater than the PSD significant threshold. The operation and monitoring requirements associated with the control devices are necessary to be established in a permit. In addition, PM emissions increases from truck traffic increases were not discussed in this permit application. Therefore, please forward this application to EPA for evaluation if you haven't.

Please let me know if you have any questions about this message or would like to discuss this issue further. Thank you.

Yu-Lien Chu
Eastern Research Group (ERG), Inc.
TEL: (608) 695-2534
E-Mail: yu-lien.chu@erg.com

From: Cenalmor Bruquetas Maria B (Barbara) <Barbara.CenalmorBruquetas@srpnet.com>
Sent: Tuesday, March 31, 2015 12:06 PM
To: Raju Bisht (rbisht@navajo-nsn.gov)
Cc: Yu-Lien Chu
Subject: FW: NGS Addendum to Title V Renewal Application

Hello Raju,

Attached is a pdf copy of the final MATS addendum for the Navajo Generating Station Title V permit renewal. The hard copy is in the mail.

Please let me know if you need anything else,

Barbara Cenalmor | Sr. Environmental Engineer | Air Quality
SALT RIVER PROJECT
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Office: (602) 236-2322 | Mobile: (602) 323-6455

